

**KENT WINDOW INC.**

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March 25, 2003

Mr. Richard H. Karney, P.E. Manager  
ENERGY STAR Program  
Building Technologies Program  
Department of Energy  
Washington DC 20585

Dear Mr. Karney:

This letter is in response to your request for public comments regarding the ENERGY STAR program. Kent Window Inc. is a vinyl window manufacturer located in Grand Rapids Michigan. We currently use Pilkington's pyrolytic Low-E glass in the production of our insulated units. As we are located in the colder region of the United States, we are very aware of the advantages of both shading coefficient and solar heat gain in overall energy savings. It has been proven not only by Pilkington and testing laboratories in Canada, but even by the Department of Energy's own analysis using RESFEN and DOE-2.1E modeling software, that there is more overall energy savings when these two variables are factored in. By adopting the Four-Zone proposal, therefore, year-in and year-out, consumers will benefit from lower overall energy use, which in turn will directly benefit both the economy and the environment.

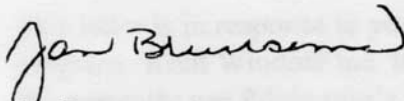
Another factor in energy savings that the DOE did not take into consideration is the production of hard-coat versus soft-coat sputtered Low-E. Sputtered Low-E glass consumes up to nine times the amount of energy needed to produce an equal unit of pyrolytic Low-E. Further, fabricating soft-coat requires additional investment in both equipment and handling, up to \$150,000 per location. Hard-coat, on the other hand, can be handled like ordinary float glass. DOE's analysis did not properly address these additional costs associated with sputter coated Low-E glass. The four-zone alternative will help to maintain a market for the high performance hard-coat Low-E that we as a manufacturer utilize, benefiting manufacturers like ourselves and consumers.

Finally, as referenced in DOE's ENERGY STAR Window proposal, DOE's investment in research and analysis (Pacific Northwest Laboratory work on the International Energy Conservation Code, Building America Program and Energy Smart Schools) substantiates the benefits of using free solar energy. On this basis, the Four-Zone Criteria as compared to the

Three-Zone alternative is further proof that solar heat gain is a key component of reducing American dependence on foreign sources of energy.

For the reasons we have listed, we strongly urge you to adopt the Four-Zone Criteria for the ENERGY STAR program. Not only will the Four-Zone Criteria benefit hundreds of small windows manufacturers like ourselves, but also the end users of our products. When consumers in Michigan and other northern states purchase a window made with hard-coat pyrolytic glass, they have made an investment in the best technology for their geographic area, thereby realizing the greatest overall energy savings.

Regards,  
KENT WINDOW INC.

  
Jan Bruursema  
President

cc: Leland Ogdahl, General Manager, Kent Window Inc.  
David Duly, Pilkington North America (by facsimile)